

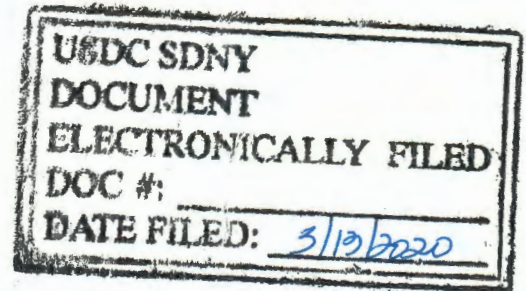
# PELUSO & TOUGER, LLP

ATTORNEYS AT LAW  
70 LAFAYETTE STREET  
NEW YORK, NEW YORK 10013

TELEPHONE: (212) 608-1234  
FACSIMILE: (212) 513-1989

BY ECF:  
March 13, 2020

Honorable Sidney H. Stein  
United States District Court Judge  
United States Courthouse  
500 Pearl Street  
New York, NY 10007



Re: United States v. Nicholas Falu,  
19 Cr 795 (SHS)

**MEMO ENDORSED**

Your Honor,

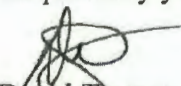
I am writing on behalf of the defendant, Nicholas Falu who as the Court is aware, has been released on bond under this Court's Order since November of 2019 under the following conditions:

- 1-\$150,000.00 PRB co-signed by three individuals
- 2- Home detention with GPS monitoring
- 3- Surrender of Passport
- 4- Drug testing
- 5- Travel only in the SDNY and EDNY.


Since his release from custody Mr. Falu has fulfilled all of his pre-trial release requirements. Mr. Falu would most respectfully like to request that his travel restrictions be expanded to include Liberty and Ellis Islands, which are technically not part of the SDNY or EDNY, for the purposes of employment. He would be working for Evelyn Hill Company of Jersey City, New Jersey and his hours would be 9:30AM – 5:00PM in the winter and 9:30AM to 5:30PM in the summer. His Pre-trial officer Joshua Rothman and AUSA Balsamello have no objection.

Thus, I would respectfully request that the Court grant the above request. Thank you very much for your consideration of this matter

Respectfully yours,

  
David Touger

SO ORDERED 3/13/2020

  
SIDNEY H. STEIN  
U.S.D.J.

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March 13, 2020  
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cc: AUSA Frank Balsamello  
Pre-Trial Services Officer Joshua Rothman